

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
THOMAS E. DAUBERT, JR.,	:	
TRACY L. DAUBERT,	:	
Debtors,	:	
	:	
v.	:	
	:	Bankruptcy No. 1:24-bk-00501-HWV
MIDFIRST BANK	:	
Movant,	:	
	:	
THOMAS E. DAUBERT, JR.,	:	
TRACY L. DAUBERT,	:	
JACK N. ZAHAROPOULOS, Trustee	:	
Respondents	:	

**DEBTORS' ANSWER TO MOVANT'S MOTION FOR RELIEF FROM
THE AUTOMATIC STAY**

AND NOW COMES, Debtors, Thomas E. Daubert, Jr. and Tracy L. Daubert, by and through their attorneys, Jacobson, Julius & Harshberger, and hereby files this Answer to Movant's Motion for Relief from the Automatic Stay and in support thereof states as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.

6. Denied. By way of additional response, it is believed and therefore averred that Debtors were otherwise current prior to the filing of the motion for relief. Debtor has proof of cleared funds that it has provided. To the extent that Debtors are behind, Debtors are willing to get current with Movant via an amended plan by adding the arrears post-petition to the plan. In

the alternative, Debtors are willing to complete a stipulation with the Movant to cure the arrears within six months or via an amended Chapter13 plan.

7. Denied. By way of additional response, it is believed and therefore averred that Debtors were otherwise current prior to the filing of the motion for relief. Debtor has proof of cleared funds that it has provided. To the extent that Debtors are behind, Debtors are willing to get current with Movant via an amended plan by adding the arrears post-petition to the plan. In the alternative, Debtors are willing to complete a stipulation with the Movant to cure the arrears within six months or via an amended Chapter13 plan.

8. Paragraph 8 is a conclusion of law to which no response is required. To the extent a response is required, said averment is denied.

9. Admitted.

10. Paragraph 10 is a conclusion of law to which no response is required. To the extent a response is required, said averment is denied.

11. Paragraph 11 is a conclusion of law to which no response is required. To the extent a response is required, said averment is denied.

WHEREFORE, Debtors respectfully request that this Honorable Court deny Movant's Motion for Relief from the Automatic Stay and further request any other relief deemed necessary and just.

Respectfully Submitted,

JACOBSON, JULIUS, & HARSHBERGER

Dated: March 18, 2025

/s/Chad J. Julius
ID# 209496
8150 Derry Street, Ste A
Harrisburg, PA 17111
717.909.5858

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CERTIFICATE OF SERVICE

I, Dera Shade, of Jacobson, Julius & Harshberger, do hereby certify that on this day I served the within **Answer to Movant's Motion for Relief from The Automatic Stay** upon the following persons via the ECF/CM system and/or by depositing a true and correct copy of the same in the United States Mail, first class, postage prepaid:

ECF/CM:

Jack N. Zaharopoulos, Esquire (Trustee) 8125 Adams Drive, Suite A Hummelstown, PA 17036	Brent J. Lemon, Esquire KML Law Group, PC 701 Market Street, Suite 5000 Philadelphia, PA 19106
United States Trustee The Sylvia H. Rambo US Courthouse 1501 North 6th Street, Bankruptcy Courtroom 8 4th Floor Harrisburg, PA 17102	

/s/ Dera Shade
 8150 Derry Street, Ste A
 Harrisburg, PA 17111
 Email: dshade@ljacobsonlaw.com

Dated: March 18, 2025